

**Exhibit A**

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746(2)**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

As representative of

THE COMMONWEALTH OF PUERTO  
RICO, *et al.*,

Debtors<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

Re: ECF No. 24045

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY**  
**PURSUANT TO 28 U.S.C. § 1746(2)**

I, Carmen Teresa León Vicéns, of legal age, single, resident of Guaynabo, under penalty of perjury declares the following:

1. My name and other circumstances are as stated above.
2. I am the Chief Financial Officer of Badillo Saatchi & Saatchi Inc. (“BSS”).
3. That in my position as Chief Financial Officer in BSS I have personal knowledge of the amounts claimed in Proof of Claim No. 16582 filed on May 17, 2018 (the “Proof of Claim”), the facts which gave rise to the Proof of Claim, and the documents included thereof in support of the Proof of Claim.

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

4. I can attest that the information contained in the Proof of Claim, including the documentation attached thereto (and which is re-submitted as part of this Declaration as **Attachments 1 – 6**), are true and correct to the to the best of my knowledge, information, and belief, and are in accordance to BSS’ business records and/or documents in my possession.
5. That the invoices for services rendered by BSS under the “Publicity Services Contract” (“Contrato de Services de Publicidad” in Spanish) (the “Contract”) executed on July 5, 2016, by and between the Puerto Rico Department of the Treasury (“Departamento de Hacienda” in Spanish, or the “Treasury Department”), and which are referenced in the Proof of Claim, remain outstanding and the Treasury Department has failed to pay these despite BSS efforts to collect such amounts prior to the Commonwealth of Puerto Rico’s filing of a Title III petition under the *Puerto Rico Oversight Management and Economic Stability Act* on May 2017.
6. That I have read the *Response To the Five Hundred Sixty-Ninth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways And Transportation Authority, And Puerto Rico Public Buildings Authority To Claims That Are Partially Satisfied and.or Partially Assert Amounts for Which the Debtors Are Not Liable* (“Response”) and can confirm that the factual assertions in the Response are true and correct to the best of my knowledge, information, and belief and/or pursuant to BSS’ business records and/or documents in my possession, and/or my personal involvement in the facts of this case.
7. I also attest that the documents included as **Attachments 7 - 10** in this Declaration are true and correct to the to the best of my knowledge, information, and belief, and are in accordance to BSS’ business records and/or documents in my possession, and which

correspond to various invoices and other related materials from November 23, 2016 to February 15, 2017, issued by BSS, JAMMedia Producers, Inc., Locuciones Anita Martinez, Comstat, Spanish Broadcasting Systems, Inc., Univision Receivables Co LLC, WCAD-FM Broadcasting & Programming Systems of Puerto Rico, Inc., Salsoul, RAAD Broadcasting Corp., GFR Media LLC, LatinMedios.com, Vocero de Puerto Rico, and MailChimp, related to work performed by BSS to the Treasury Department under the Contract and in further support of the amount of the claim asserted in the Proof of Claim.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 22, 2023.



Director  
Badillo Saatchi & Saatchi, Inc.